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MEMO ENDORSED

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January 12, 2021

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Velez et al.*, No. 19 Cr. 862 (VEC)
Client: Michael Gonzalez

Dear Judge Caproni:

I write to request an extension of the deadline set by the Court to propose a briefing schedule for motions to sever and for a bill of particulars. At the December 22, 2020, telephonic status conference your Honor directed me to file a proposed briefing schedule on or before January 15, 2021. On January 5, at the parties' request, the Court scheduled a change of plea hearing for Mr. Gonzalez that will take place on January 19 and that, should the Court accept the plea of guilty, will render severance or a bill of particulars moot. Accordingly, I respectfully request an extension to January 29, 2021, by which time Mr. Gonzalez or his co-defendants may propose a briefing schedule for severance and bill-of-particular motions. I have conferred with counsel for the government, who has no objection to this application.

Respectfully submitted,

/s/ Ezra Spilke

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Counsel for Michael Gonzalez

cc: All counsel of record

Application GRANTED.

SO ORDERED.



Date: January 12, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE